

Kissinger, Lon

From: Fleming, Sheila
Sent: Monday, March 03, 2014 2:52 PM
To: Kissinger, Lon
Subject: FW: AK water quality Assessment and fish consumption studies

This could create a significant workload. We'll see where this goes and discuss it when you get back.

More broadly, we seem to be running into issues with other data collected under IGAP grants. We aren't asked to review and comment on SAPs/QAPPS and then the tribes want to use the data for decision-making purposes even though the DQOs for that purpose weren't fully developed. This came up recently on some data collected by Telida. Katherine Brown asked Julius if he could do a 'risk assessment' with the data. The DQOs or QAPP were never reviewed by an EPA risk assessor or the QA team, and I don't think a risk assessment work plan was ever developed. I've already mentioned this disconnect to Ginna, but it seems like this may be another example of collect the samples first and ask questions later.

S-

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From: Grepo-Grove, Gina
Sent: Monday, March 03, 2014 2:24 PM
To: Chung, Angela; Thomas, Sally; Williamson, Ann
Cc: Opalski, Dan; Psyk, Christine; Fleming, Sheila
Subject: RE: AK water quality Assessment and fish consumption studies

Hello,

I talked to Lon about this issue before and he sent me the links that he has for fish consumption surveys and requirements. I agree with Angela and it may be a good idea to provide the AK Tribes with some guidance on how to conduct fish consumption surveys.

So far, the only AK Tribe that currently has a fish consumption study is the Seldovia Village Tribe (SVT) with the Cook Inlet Tribe. Phase I of the project which includes the survey was already completed in 2013. DEC reviewed the phase 1 work plan of the study, including the survey questionnaires and the annual report. Since phase 1 did not involve environmental data collection, a QAPP was not submitted to EPA for review and approval. Now SVT is on phase 2 of the project and both DEC & EPA are reviewing the SVT phase 2 QAPP.

At the Alaska Forum on the Environment (AFE) meeting last February, we learned that the other AK tribes (example: Telida, Sitka, Bristol Bay) are also planning to conduct their own fish consumption studies in their villages for consideration in the upcoming AK WQS revision. This new information alarmed DEC, and since most of the other tribes do not engage with DEC on the development of their fish consumption studies (if it's fully funded by IGAP), they requested from me that they'd be given an opportunity to review and concur with the fish consumption and/or water quality assessment QAPP, if one is submitted by AK tribes to EPA for review and approval. Since DEC already did the review for Seldovia, for consistency, I agreed.

Survey data was not included in the environmental data listed in the existing EPA QA Manual (CIO-2105) and R10 has not been requiring the submission of a QAPP for surveys. However, in the new final draft of the Data Quality Standards (CIO2106), survey data is included. If the survey questionnaires are important for the fish consumption rate studies, we (EPA) will need to ensure that the survey plans are also reviewed and approved.

I am open for discussions/chats/direction if needed. Thank you.

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From: Chung, Angela
Sent: Monday, March 03, 2014 1:13 PM
To: Grepo-Grove, Gina; Thomas, Sally; Williamson, Ann
Cc: Opalski, Dan; Psyk, Christine; Fleming, Sheila
Subject: RE: AK water quality Assessment and fish consumption studies

Hi Gina and Sally,
Thanks for your message Gina. Since these are grants, I'm presuming we don't have any direct oversight role. However, if the tribes are interested in providing these grant-funded surveys to ADEC for consideration in their upcoming WQS revisions, we may want to consider whether EPA should provide the AK tribes some advice about minimum technical requirements/optimal survey design, etc. Frankly, we probably should have a similar conversation with ADEC too, just so they are aware of the types of data/information we would expect them to consider.

OEA (Lon) is currently coordinating with dietary survey experts (e.g., EPA HQ and National Cancer Institute) and providing this type of technical assistance to the State of Idaho and tribes who are either currently or thinking about implementing fish consumption surveys. Not sure that he has the capacity but it's something we should consider since ADEC has informed us/Dennis that they plan to revise their human health criteria soon.

Let me know what you think and/or if we should schedule a quick chat about this. Thanks.

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From: Grepo-Grove, Gina
Sent: Monday, March 03, 2014 12:32 PM
To: R10 QA Support; Thomas, Sally; Williamson, Ann; Chung, Angela
Cc: Herbst, John; Gay, Santina; Fordham, Tami; Villa, Catherine; Lowinger, Mahri; Huang, Sarah
Subject: AK water quality Assessment and fish consumption studies

Hello,

During the AK DEC QSR in February 2014, the Division of Water management expressed concern regarding the growing Tribal AK fish consumption and water quality assessment projects occurring in AK state. It is assumed that the final goal

of the studies is to support the revision of the state's fish consumption rate and eventually, the state's water quality criteria. The AK Tribes' projects are funded by EPA through IGAP grants and the state is normally not included in the review process. Given the very different relationship tribes have in Alaska, versus those of the rest of the country, DEC requests that the state play an active role in the development review and approval of these QAPPs and surveys.

At the meeting, EPA & DEC agreed to include DEC Division of Water QA Officer, Mr. Douglas Kolwaite and Mr Brock Tabor (Water Quality Standards, Assessment and Restoration Manager, in the review of the Tribal AK fish consumption and water quality assessment QAPPs. These two DEC Division of Water staff will also need to concur with the final QAPP as part of the approval process.

The Instructions for PO and QA team are in the attached document. The newly updated QAPP template for AK Tribe's Water Quality Monitoring is also attached. Please feel free to distribute the QAPP template to the AK Tribes.

Contact me if you have questions. Thank you.

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